

As a child, my primary language was American Sign Language and English was my 2nd language, I also have a hearing loss and am Sign Language Interpreter who provides services via Video Relay Services over broadband to communicate in American Sign Language, my primary language and English. Growing through the years, I have witnessed and experienced many facets in technology in regard to communication.

As a child, I interpreted telephone conversations for my parents similar to what I do for others relying on this service today. But, as a child obviously, I did not pose the skills necessary to conduct various calls that were placed before me and know I made numerous mistakes, thank God they were not tragic as I have witnessed others to have been. It is my expectation that we will not and can not revert backwards especially when we have found the best and most successful technology in history, which is VRS.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission. The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide "functionally equivalent" communications.

Forcing native Signers to revert back to using TDD technology or relying on others including children to communicate is not the solution we should impose, nor does this make sense. During the time when technology introduced TDD's to assist with communications, numerous tragedies occurred due to language misunderstandings which equated in unclear or confusing communication, this was highly due to the LANGUAGE BARRIERS between both parties. Even with the email and text capabilities we have today, misunderstandings are numerous. I've witnessed this time and time again, until the opening of VRS. With VRS, language was clarified, bridged, provided in a timely manner and for the most part provided seamlessly and with MUCH more clarity than it has ever been. Both parties were thrilled, especially in regard to the audio callers/receivers, they especially were thrilled due to not having the hold\ wait time which occurs with TDD communication. For those who use ASL as their primary language, they are thrilled due to finally receiving more clear communication. For those of us who not only provide this service, but who have family and friends who are deaf, VRS is a life-altering broadband service that is a vital link between BOTH the hearing and deaf community. VRS provides true ACCESSIBILITY for those who use American Sign Language (ASL) as their primary language and these individuals are consumers who are supposed to be protected by a Federal Law the ADA.

WHY would we as AMERICA take away technology that supports a large group of disabled consumers of which this technology IS working, growing and functioning?

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access, and inclusion ? or force deaf users to revert to TDD communications. And, you will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even in the face of disproportionate poverty, disenfranchisement, and isolation.

I am deeply disturbed to see the Commission's recent Public Notice on VRS rates. These proposals will push VRS providers into serious cutbacks, bankruptcy and possibility of being an end to VRS, as with what almost happened only a few years ago. This proposal seems to contradict what we are educated on in Business Economics. The fore-runners in whatever business industry we are talking about is not penalized for rapid growth in technology or for providing excellent products and services they are commended and encouraged to do more. Personally, I have worked with the top performing VRS vendor's as an interpreter and have worked in the VRS industry almost since it's birth. Years ago, when rates were drastically reduced, numerous changes were made and I was directly impacted due to losing numerous interpreters. When the FCC rate change occurred, immediate repercussions followed. In order to sustain the call volume, interpreters who remained had to work harder and longer for an extended periods of time to try and satisfy and maintain call volumes, interpreters were negatively impacted. Consumers both deaf and hearing were impacted due to longer wait/hold times and/or having exhausted interpreters due to the shortage of interpreters. Are we repeating history so soon? The volumes and calls are there and will not go away unless the service of VRS is shut down or we run out of interpreters due to burn out or physical damage. This all can be avoided by using caution, common sense and discretion on setting fair practices.

You should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, providing a larger and better trained pool of interpreters, and better videophones with an array of enhanced features. Monthly payments for broadband are a big expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals.

Progress toward functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done, one example would be extending further outreach to the rural areas. The rural areas are vast and there are numerous consumers of whom are under-served in obtaining necessary technologies to allow adequate communications to occur. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

As one of the millions of people who invest monies, every month via charges/fees assessed to our phones, cell phones, etc., we place our trust in you and one of the responsibilities include the ability to provide fair and just reimbursements to vendor's who are providing services, equipment etc. for those who have disabilities to receive the technology they deserve to promote not only functional equivalencies but equality via in telecommunications. I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals.

Thank you for your time and consideration.

Sincerely,

D. Anderson